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INTERNATIONAL, INC.; MENZIES AVIATION  
(USA), INC.; TRACY AGUILAR

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

GEARY SHA, an individual,

Plaintiff,

vs.

AIRCRAFT SERVICE INTERNATIONAL,  
INC., a Delaware corporation; MENZIES  
AVIATION (USA), INC., a Delaware  
corporation; TRACY AGUILAR, an individual;  
and DOES 1 through 50, inclusive,

Defendants.

Case No. 3:24-cv-01738

**DECLARATION OF TALIN  
BAZERKANIAN IN SUPPORT OF  
DEFENDANT AIRCRAFT SERVICE  
INTERNATIONAL, INC.'S NOTICE OF  
REMOVAL OF ACTION 28 U.S.C. § 1332  
(DIVERSITY JURISDICTION)**

**DECLARATION OF TALIN BAZERKANIAN**

I, Talin Bazerkanian, declares as follows:

1. I am the Senior Vice President, Human Resources, Americas Region for Menzies Aviation, Inc., the parent company of defendants Aircraft Service International, Inc. ("ASI") and Menzies Aviation (USA), Inc. ("Menzies") in the above-entitled matter. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, I could and would testify competently and under oath to the following facts.

2. On June 15, 2023, Plaintiff served ASI with a copy of the Complaint.

3. I have been employed by Menzies Aviation, Inc. for over thirty years, and have worked in various human resources functions. I have been Menzies Aviation, Inc.'s highest-ranking human resources employee in the Western Hemisphere for approximately 20 months and have significant and personal knowledge regarding ASI's and Menzies' legal structure, organization, and how the companies operate. Through such personal knowledge and experience, I can state that:

a. ASI is a corporation incorporated under the laws of Delaware;

b. ASI is headquartered in Texas with a principal place of business in Grapevine, Texas;

c. Menzies is a corporation incorporated under the laws of Delaware; and

d. Menzies is headquartered in Texas with a principal place of business in Grapevine, Texas (previously Fort Worth, Texas).

4. ASI formerly employed Plaintiff in the positions of Account Manager and General Manager working at its operation at the San Francisco International Airport. Prior to executing this Declaration, I reviewed Plaintiff's personnel file and verified that Plaintiff's most recent salary compensation as a General Manager was \$108,000 per year, equivalent to an hourly pay rate of approximately \$51.92.

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1 I declare under penalty of perjury, under the laws of the State of California and the United States  
2 of America, that the foregoing is true and correct.

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4 Executed this 20 day of March, 2024, in

Los Angeles

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8 Talin Bazerkanian

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DECLARATION OF TALIN BAZERKANIAN IN SUPPORT OF NOTICE of REMOVAL